

TSD File Inventory Index

Date: October 10, 2009

Initial: CM/Ken/20

Facility Name: <u>R. L. Drake Company (Dr. Felder Site)</u>			
Facility Identification Number: <u>OHJ 400 010 419</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)	X	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents <u>C 3</u>	1
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc	X	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 2

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F. Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement.	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule!*
C.3 documents are in separate folder



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

OH T400010419

REACKNOWLEDGEMENT

DRAKE R L CO
230 INDUSTRIAL DR
FRANKLIN

OH 45005

INSTALLATION ADDRESS

230 INDUSTRIAL DR
FRANKLIN

OH 45005

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

DRAKE R L COMPANY**
314 N FOURTH ST
MIAMI SD, OH 45342

000016 AUG 12 80

III. LOCATION OF INSTALLATION

314 N FOURTH ST
MIAMI SD, OH 45342

FOR OFFICIAL USE ONLY

COMMENTS

APPROVED DATE RECEIVED (yr., mo., & day)
F OHT400010 41921 A 800811

I. NAME OF INSTALLATION

RL DRAKE CO

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 230 INDUSTRIAL DR

CITY OR TOWN

FRANKLIN

OH 45005

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 230 INDUSTRIAL DR

CITY OR TOWN

FRANKLIN

OH 45005

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

2 DAVID WILDERMUTH PROCESS ENG

PHONE NO. (area code & no.)

513-866-1396

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 RL DRAKE CO

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

OHT400010419

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

047400010419

I.D. - FOR OFFICIAL USE ONLY																
S	W	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	0	4	7	9	6	7	7	9	1	4	2	1				

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001	2 F005	3 F007	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Donald E. Wysong</i>	NAME & OFFICIAL TITLE (type or print) <i>Vice-President of Engineering</i>	DATE SIGNED <i>8/5/80</i>
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EPA Form 8700-12 (6-80) REVERSE

File *[Signature]*

8-14-80

~~OHDOO-421-2902~~
OHT400010419



July 24, 1980

EPA - Region V
RCRA Activities
P. O. Box 7861
Chicago, IL

Dear Sirs:

This is to inform you that all activities that took place at the R. L. Drake Company, 914 N. Fourth St., Miamisburg, OH 45432 have been relocated to the R. L. Drake Company, 230 Industrial Drive, Franklin, OH 45005.

Very truly yours,

R. L. DRAKE COMPANY

Ronald E. Wysong
Ronald E. Wysong
Vice President of Engineering
and Manufacturing

REW/kf

JUL 31 1980



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

George V. Voinovich
Governor

Donald R. Schregardus
Director

July 24, 1992

Re: R. L. Drake Company
US EPA ID No.: OHT400010419
Closure Plan

R. L. Drake Company
Attn: Mr. William Maugans
230 Industrial Drive
Franklin, Ohio 45005

Dear Mr. Maugans:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for the R. L. Drake Company located at 230 Industrial Drive, Franklin, Ohio 45005 will appear the week of July 27, 1992 in The Western Star, Lebanon, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, September 1, 1992.

Copies of the closure plan will be available for public review at the Lebanon Public Library, 101 South Broadway, Lebanon, Ohio 45036 and the Ohio EPA, Southwest District Office, 40 South Main Street, Dayton, Ohio 45402.

Please contact Randy Sheldon at (614) 644-2977, if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

TEC/rs/closurereceipt

cc: Lisa Pierard, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DHWM, RCRA TAS
Don Marshall, Ohio EPA, SWDO, DHWM



PUBLIC NOTICE

Warren County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: R. L. Drake Company, 230 Industrial Drive, Franklin, Ohio 45005, US EPA ID No.: OHT400010419. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan involving a Hazardous Waste Storage Area for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Lebanon Public Library, 101 South Broadway, Lebanon, Ohio 45036 and the Ohio EPA, Southwest District Office, 40 South Main Street, Dayton, Ohio 45402. Comments concerning this plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Data Management Section, PO Box 1049, Columbus, Ohio 43266-0149 and Ohio Environmental Protection Agency, Southwest District Office, 40 South Main Street, Dayton, Ohio 45402.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020 Fax (614) 644-2329

Richard F. Celeste
Governor

CERTIFIED MAIL

Notice of Deficiency

September 19, 1990

William Maugans
R.L. Drake Company
230 Industrial Drive
Franklin, Ohio 45005

RE: Closure Plan
R.L. Drake Company
OHT 400 010 419

Dear Mr. Maugans:

On January 24, 1990, Ohio EPA received from R.L. Drake Company a closure plan for a hazardous waste container storage area at your facility located at 230 Industrial Drive, Franklin, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that R.L. Drake's proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rule 3745-66-12. The public comment period extended from February 12, 1990, to March 20, 1990. No public comments were received in this matter by Ohio EPA.

Pursuant to OAC 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter. The modified closure plan should be submitted to: Ohio-Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Frank Bryant at The Ohio Environmental Protection Agency Southwest District Office, 40 South Main Street, Dayton, Ohio 45402.

NOTIF.
ONLY File
SQG

Mr. William Maugans
Page Two

Upon review of the resubmitted plan, I will prepare and issue either a draft or a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Frank Bryant at (513) 285-6357 or Randy Meyer at (614) 644-2956.

Sincerely,



Richard L. Shank, Ph.D.
Director

RLS/RM/pas

cc: Tom Crepeau, DSHWM, Central File, Ohio EPA
Lisa Pierard, USEPA, Region V
Joel Morbito, USEPA, Region V
Frank Bryant, SWDO, Ohio EPA
Don Marshall, SWDO, Ohio EPA
Randy Meyer, CO, Ohio EPA

2118U

ATTACHMENT A
R.L. DRAKE COMPANY
DRUM STORAGE CLOSURE PLAN
OHT 400 010 419

SECTION I: General Comments

- I1 Closure performance standard. OAC 3745-66-11. This closure plan lacks sufficient detail to determine if the closure performance standard will be met.
- I2 Description of partial and/or final closure of the facility. OAC 3745-66-12(B). The closure plan shall include all information necessary to ensure closure of the storage pad.
- I3 Identification of maximum extent of operation. OAC 3745-66-12(B). R.L. Drake shall give the maximum extent of hazardous waste activity that has ever occurred at the facility. The plan shall also state the length of time that hazardous waste has been managed at the facility. All hazardous waste activity which has ever occurred at the facility must be listed.
- I4. Estimate of maximum inventory of hazardous waste. OAC 3745-66-12(B)(3). R.L. Drake shall give an accurate estimate of the maximum inventory of hazardous waste ever on-site. The plan does not give the maximum inventory of hazardous waste other than the waste stored on the outside storage pad. A maximum inventory of all hazardous waste generated on-site must be given. All hazardous waste must be listed by hazardous waste number and chemical name. All hazardous constituents must be listed.
- I5. Detailed description of removal of hazardous waste inventory. OAC 3745-66-14 and 3745-66-12(B)(3). R.L. Drake shall include a detailed description of removal of each hazardous waste which was stored on-site for greater than 90 days. This description must also include the F006 waste which was stored near the pretreatment plant.

The plan does not include provisions for compliance with land disposal restrictions (See 40 CFR 268) when manifesting the hazardous waste off-site.

- I6. Identification of and type of off-site hazardous waste management units. OAC 3745-66-12(B)(3). R.L. Drake shall provide the name, location or USEPA I.D. # of the off-site management unit or units.

R.L. Drake shall list the types of treatment or disposal methods off-site management units will provide. If R.L. Drake does not yet have a designated TSD facility which will receive all wastes generated by this closure, then the plan must be revised to indicate that Ohio EPA will be notified of the TSD facility selected at least ten days prior to shipment.

- I7. Decontamination and removal of hazardous waste residues. OAC 3745-66-12(B)(4). R.L. Drake shall provide the name, location or USEPA I.D.# of the off-site management units which will receive the hazardous waste residue.

R.L. Drake shall make provisions for determining if residues are subject to LDR requirements (see 40 CFR 268).

R.L. Drake shall list the types of treatment or disposal methods used by off-site management units accepting the hazardous waste residues.

- I8. Schedule for closure of each unit and final facility closure. OAC 3745-66-12(B)(6) and 7. R.L. Drake shall include a detailed schedule of closure activities. All closure activities must be included in the schedule.

The plan must include a milestone chart, beginning with the Director's approval as Day 0.

- I9. Amendment of Closure Plan. OAC 3745-66-12(C). R.L. Drake shall make provisions for amendment in the event of changes in the schedule or unexpected delays.

- I10. Waste treated removed or disposed of within 90 days and extensions of time periods. OAC 3745-66-12(A). R.L. Drake shall indicate that all hazardous waste will be removed from the storage pad within 90 days following approval of the closure plan.

- I11. Closure completed within 180 days and extensions of time periods. OAC 3745-66-13(B). The plan states that closure is expected to be complete within 6 months; however, there is no schedule included which demonstrates that this is reasonable.

- I12. Disposal or decontamination of equipment, structure, and soils. OAC 3745-66-14. R.L. Drake shall adequately demonstrate that the storage pads and decontamination equipment will be properly decontaminated. (See comments contained in Section II below.)

- I13. Certification of closure. OAC 3745-66-15. The plan must state that the closure certification shall be submitted to Ohio EPA within 60 days of completing closure.

- I14. Closure cost estimate. OAC 3745-66-42. R.L. Drake shall include a closure cost estimate as required by this regulation. The closure cost estimate must be based on the cost of hiring a third party to close the pad and must detail all costs associated with closure assuming the most expensive contingency.

SECTION II: Specific Comments

- II1. Detailed description of how the container storage area will be closed. OAC 3745-66-12(B)(1). R.L. Drake shall provide the necessary information to achieve the closure performance standard. (See comments listed below.)
- II2. Identification of maximum extent of operation of container storage area. OAC 3745-66-12(B)(2). R.L. Drake must give the date when hazardous waste was first managed on the storage pad. R.L. Drake must include detailed drawings of the storage pad and secondary containment system.
- II3. Estimate of maximum inventory of hazardous waste ever in the container storage area. OAC 3745-66-12(B)(3). R.L. Drake must list all hazardous waste ever stored on the storage pad by chemical name and EPA hazardous waste number. R.L. Drake lists alchrome and hydrocarbon solvents as wastes stored on the pad. This is inadequate because these are not specific chemical names.
- II4. Detailed description of removal of hazardous waste inventory. OAC 3745-66-12(B)(3) and 3745-66-14. R.L. Drake must provide a detailed description of how the hazardous waste inventory will be managed during closure. The description must include treatment, storage and disposal of all hazardous waste stored on the pad.
- II5. Identification of and type of off-site hazardous waste management unit(s). OAC 3745-66-12(B)(3). R.L. Drake does not specify the TSDF to be used by the facility.

R.L. Drake shall specify if more than one TSDF will be used for disposal of the various wastes.

R.L. Drake shall specify the methods of treatment of disposal to be used by the off-site management unit(s).

- II6. Criteria for determining the extent of decontamination necessary. OAC 3745-66-12(b)(4) and 3745-66-14. R.L. Drake must provide a plan for sampling soil adjacent to the pad and across the asphalt drive. The curb does not extend to the building on the northeast. The sump was full of water during a July 14, 1989 inspection which could have allowed contaminants to escape from the pad and run onto the asphalt drive and adjacent soils.

R.L. Drake must demonstrate that the storage pad, sump and curb are free of cracks or gaps. If cracks or gaps are present, R.L. Drake shall sample immediately beneath them. If cracks or gaps are not evident, R.L. Drake must collect at least four random soil samples beneath the pad.

R.L. Drake states that the rinseate in the sump is the key to determining whether the pad is contaminated. This is incorrect because many drums were observed open or leaking during a July 14, 1989, inspection. Also, material was observed on the pad, indicating the pad is contaminated.

- II7. Detailed description of decontamination steps. OAC 3745-66-12(B)(4) and 3745-66-14. R.L. Drake shall provide sufficient details on decontamination procedures.

The specific number of washes required must be specified. At least 2 or 3 washes with the final rinseate being tested are required.

R.L. Drake shall describe the equipment which will be used to decontaminate the storage area.

Regardless of whether or not the standing water in the sump tests clean, the pad must still be washed 2 or 3 times to ensure there is no residual contamination of the pad.

- II8. Procedures for cleaning equipment and structure and removing contaminated soils. OAC 3745-66-12(B)(4) and 3745-66-14. R.L. Drake shall make provisions for cleaning decontamination equipment or personal protective equipment.

R.L. Drake shall indicate how clean areas will be protected from contamination.

R.L. Drake shall specify where contaminated soil will be stored prior to disposal.

R.L. Drake must provide an estimate of the volume of wash water expected to be produced from the decontamination process.

- II9. Detailed description removal of hazardous waste residue. OAC 3745-66-14 and 3745-66-12(B)(4). R.L. Drake shall indicate the TSDF which will accept residue.

R.L. Drake shall describe RCRA manifesting or recordkeeping which will be required for residues.

R.L. Drake shall consider LDR regulations (see 40 CFR 268) which may apply to residues.

The criteria for determining the methods of disposal of contaminated rinseate must be specified.

Section 10 of the plan must be clarified. This section implies that the facility intends to treat the hazardous waste generated from decontamination activities. All material generated during decontamination must be collected, properly evaluated and properly disposed of. If the material is hazardous waste, then all applicable State of Ohio hazardous waste regulations will apply to the storage and disposal of the material.

R.L. Drake must contain provisions for complying with all State of Ohio hazardous waste regulations during closure.

- III10. Methods for sampling and testing to demonstrate success of decontamination. OAC 3745-66-12(b)(4) and 3745-66-14. R.L. Drake shall include a complete list of parameters to be analyzed. Every sample must be analyzed for all hazardous constituents ever managed at the facility.

R.L. Drake shall include specific SW-846 methods for sampling and analysis for each parameters.

The plan shall include laboratory QA/QC procedures.

The plan's proposed clean standards are inadequate. Clean standards shall be based upon the public Drinking Water maximum contaminant level (MCL) for hazardous waste constituents for rinseate. If no MCL is available, then the maximum contaminant level goal (MCLG) will be used (40 CFR 141.50). If neither an MCL nor an MCLG is available, then 1 mg/l shall be used.

Clean standards for soils shall be below detection limits for non-naturally occurring hazardous constituents which were stored in the hazardous waste storage area. Clean standards for naturally occurring compounds (i.e., metals) shall be the background mean plus two positive standard deviations (assuming normal data distribution).

R.L. Drake shall select sixteen background sampling points in consultation with Frank Bryant, Ohio EPA, SWDO. These points shall be selected to represent an area not directly affected by any past or present waste activities. All points and sampling data from these points shall be reviewed and approved by Ohio EPA. Analytical data from these points shall be submitted to Frank Bryant, Ohio EPA, SWDO, within ten days of receipt by R.L. Drake. Ohio EPA may reject any sampling point.

The plan must be revised to include a soil sampling plan.

The list of parameters must include, but not necessarily be limited to, the following:

Acetone	Arsenic
Barium	Toluene
2 Butanone	Cadmium
Cyanide	Chromium
Lead	Mercury
Selenium	Silver

These parameters were detected from samples collected on July 14, 1989, by Ohio EPA.

IIII. The plan shall address the area near the pretreatment plant where drums of F006 have been stored for greater than 90 days. All comments listed above would apply except those associated with soil sampling since the site is located inside a building.

2118U



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

Richard F. Celeste
Governor

February 7, 1990

Re: R. L. Drake Company
U.S. EPA ID No.: OHT400010419
Closure Plan

SQB

R. L. Drake Company
Attn: Mr. William Maugaus
230 Industrial Drive
Franklin, Ohio 45005

Dear Mr. Maugaus:

A public notice acknowledging the Ohio EPA's receipt of a closure plan for the R. L. Drake Company located at 230 Industrial Drive, Franklin, Ohio will appear the week of February 12, 1990, in The Western Star, Lebanon, Ohio. The Director of the Ohio EPA will act upon the closure plan request following the close of the public comment period, March 20, 1990.

Copies of the closure plan will be available for public review at the Lebanon Public Library, 101 S. Broadway, Lebanon, Ohio 45035 and the Ohio EPA, Southwest District Office, 40 S. Main Street, Dayton, Ohio 45402.

I may be contacted at (614) 644-2977 if you have any questions concerning this matter.

Very truly yours,

Thomas E. Crepeau, Manager
Data Management Section
Division of Solid & Hazardous Waste Management

TEC/dhs

cc: Lisa Pierard, U.S. EPA, Region V
Randy Meyer, Ohio EPA, DSHWM, TA&ES
Frank Bryant, Ohio EPA, DSHWM, SWDO

2471R(53)

PUBLIC NOTICE

Warren County

RECEIPT OF HAZARDOUS WASTE CLOSURE PLAN

For: R. L. Drake Company, 230 Industrial Drive, Franklin, Ohio 45005, U.S. EPA ID No.: OHT400010419. Pursuant to OAC Rule 3745-66-10 thru 17 and 40 CFR, Subpart G, 265.110 thru 117, the Ohio Environmental Protection Agency (Ohio EPA) is hereby giving notice of the receipt of a Hazardous Waste Facility Closure Plan for a Hazardous Material Storage Area for the above referenced facility. Ohio EPA is also giving notice that this facility is subject to a determination concerning corrective action, a requirement under the Hazardous and Solid Waste Amendments of 1984, which concerns any possible uncorrected releases of hazardous waste or hazardous constituents to the environment from any current or previous solid waste management units at the above facility. A corrective action determination is required from hazardous waste facilities intending to close.

Copies of the facility's Closure Plan will be available for public review at the Lebanon Public Library, 101 S. Broadway, Lebanon, Ohio 45036 and the Ohio EPA, Southwest District Office, 40 S. Main Street, Dayton, Ohio 45402. Comments concerning the Closure Plan or factual information concerning any releases of hazardous waste or hazardous waste constituents by the above facility requiring corrective action should be submitted within 30 days of this notice to: Ohio Environmental Protection Agency, Div. of Solid & Hazardous Waste Management, Data Management Section, Attn: Thomas E. Crepeau, Box 1049, Columbus, Ohio 43266-0149.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

TRACKING - DHWM, CM&ES
TO GO ON: ☒ RCRIS ☒ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG 2/18
ENTERED: ☒ RCRIS ☐ DBASE ☐ FO LOG ☐ USEPA LOG ☐ CJ LOG 4/7
RCRIS ENTRY CODES: (EVALUATION) 2/18 (ENFORCEMENT) 2/18
CEI ☐ CI ☐ OTHER ☐ INITIAL NOV ☐ FOLLOW-UP NOV ☐
FULL RTC ☐ PRTL RTC ☐ TCLP ☐ LDR ☐ SENT TO USEPA: YES ☐ NO ☐
George V. Voinovich
Governor
Donald R. Schregardus
Director

February 28, 1992

RECEIVED
MAY 18 1992

Re: R.L. Drake
OHT400010419
Financial Assurance

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION 5

William Maugans
R.L. Drake
230 Industrial Drive
Franklin, OH 45005

RECEIVED
WMD RECORD CENTER

JAN 06 1995

Dear Mr. Maugans:

On February 13, 1992, I conducted a review of R.L. Drake's financial assurance documents to evaluate compliance with Rules 3745-66-42 and 3745-66-43 of the Ohio Administrative Code (OAC) for its Franklin facility.

In addition, the above-referenced facility entered into a Consent Order with the State of Ohio on October 29, 1991. Pursuant to this Order, the facility is required to comply with Rules 3745-66-42 and 3745-66-43 of the OAC.

To demonstrate financial assurance for closure of this facility, Ohio EPA received on November 27, 1991, a Letter of Credit (#75673-GRF) for \$8,500.00 issued by Bank One of Dayton, Ohio on November 20, 1991, with an expiration date of November 22, 1992.

Upon review of the documentation submitted, Ohio EPA finds the following violations:

Consent Order (Section IV A) dated October 29, 1991 and OAC Rule 3745-66-42. Ohio EPA has not received a written detailed closure cost estimate. The Order requires the facility to submit to Ohio EPA within thirty (30) days of the entry of the Order a detailed written estimate of the cost of closing the facility. In addition, OAC Rule 3745-66-42 requires the owner or operator to have a detailed written estimate in current dollars of the cost of closing the facility.

The closure cost estimate included in the November 19, 1991, closure plan was not a detailed closure cost estimate. The closure cost estimate should clearly specify direct costs such as labor and equipment and indirect costs such as supervision fees and contractor fees. Costs for subtasks included in each activity must be stated (e.g., waste inventory removal/disposal should include cost for subtasks such as disposal costs, transportation cost of wastes off-site and costs for decontamination) materials. Also, disposal of rinseate must be a third party cost instead of a nominal cost in R.L. Drake's treatment plant.

William Maugans
R.L. Drake
February 28, 1992
Page Two

Please resubmit to me a detailed closure cost estimate to address the deficiencies identified above including costs for specific subtasks identified in the R.L. Drake closure plan.

Please note that OAC Rule 3745-66-43(C) (7) specifies that when the cost estimate increases to an amount greater than the amount of the credit, the owner/operator, within sixty (60) days after the increase, shall cause the Letter of Credit amount to increase or obtain other financial assurance to cover the increase. Evidence that the owner/operator has adequate financial assurance for the increase must be submitted to the Director. In light of this, should the cost estimate increase upon addressing the above deficiencies, Ohio EPA would require evidence that the amount of the Letter of Credit has been increased or other financial assurance obtained as required by this rule.

Consent Order (Section IV B) dated October 29, 1991 and OAC Rule 3745-66-43. The facility has not provided all of the appropriate documentation to demonstrate financial assurance as required by OAC Rule 3745-66-43 including an originally signed duplicate of the standby trust agreement to the Letter of Credit and an accompanying letter stating the amount of credit applicable to the site covered by the Letter of Credit. The accompanying letter must also include the Letter of Credit number, name of the issuer, date, EPA identification number, name, and address of facility and the amount of funds assured for closure and/or post-closure care of each facility. Also, the Letter of Credit does not include the exact wording in paragraph (D) of OAC Rule 3745-55-51. Specifically, the third paragraph of the Letter of Credit contains language stating "if so extended automatically.... expiration date shall be November 22, 1996". This additional language is not included in the wording required by OAC rule 3745-55-51(D) and must be deleted. The Letter of Credit must include only the exact wording in paragraph (D) of OAC rule 3745-55-51. Please resubmit a revised Letter of Credit with identical wording as specified in OAC rule 3745-55-51(D).

To demonstrate abatement of the above violations, please respond to me within thirty (30) days of receipt of this letter by submitting a detailed closure cost estimate, identical wording of the Letter of Credit as specified in paragraph (D) of OAC Rule 3745-55-51, standby trust fund, and the accompanying letter.

Please be advised that your failure to comply with the violations listed in this letter may result in the assessment of the stipulated penalty provision present in the October 29, 1991 Consent Order.

William Maugans
R.L. Drake
February 28, 1992
Page Three

If you should have any questions regarding this matter, please contact me at
(614) 644-2934.

Sincerely,



Tina Jennings
Compliance Monitoring & Enforcement Section
Division of Hazardous Waste Management

TJ.lcn

cc: Laurie Stevenson, CMES, DHM
Dave Stroh, CMES, DHM
Phil Harris, DHM, SWDO
Shane Farolino, AGO/EES

C.2 Compliance/ Enforcement

2

6

4

4

2

DEC 13 1990

5HR-12

Mr. Timothy D. Hoffman, Esq.
Coolidge, Wall, Womsley & Lombard
600 IBM Building
33 West First Street
Dayton, Ohio 45402

Re: Return to Compliance
R.L. Drake Company
OHT 400 010 419

Dear Mr. Hoffman:

We have received and reviewed your letter of November 2, 1990, regarding our Notice of Violation (NOV) dated October 5, 1990.

The information submitted with your letter appears to meet the requirements of the land disposal restriction regulation found at 40 CFR Part 268. We have, therefore, returned this facility to compliance for those violations cited in our NOV.

If you should have any further questions, please contact Mr. Gordon Garcia of my staff at (312) 886-8097.

Sincerely yours,

Ann Budich, Acting Chief
IN/MN/OH Enforcement Program Section

cc: Mr. William B. Maugans
R.L. Drake Company
230 Industrial Drive
Franklin, Ohio 45005

Mike Savage, OEPA
Frank Bryant, SWDO

bcc: Ann Budich, REB
5HR-JCK-garcia.walker 6-8093 diskette gordon filename: tim.hof

CONCURRENCE REQUESTED FROM REB			
OTHER STAFF	REB STAFF	REB SECTION CHIEF	REB BRANCH CHIEF
Ar 12/12/90	ys 12/12/90	ab 12-12-90	

Robert B. Womsley
John C. Lombard
Ronald S. Pretokin
Roger J. Makley
Jacob A. Myers
Jonas J. Gruenberg
Try A. Melnick
le F. Wilberding
ugh E. Wall, III
Robert P. Bartlett, Jr.
Glenn L. Bower
J. Stephen Herbert
John A. Cumming
Fred A. Ungerman, Jr.
R. Scott Blackburn
Richard A. Schwartz
Sam Warwar
Terence L. Fague
Anne M. Frayne
Kevin J. O'Brien
Timothy D. Hoffman
Steven C. Scudder
John C. Chambers
Laura G. Harrelson
Martine R. Dunn
Douglas M. Ventura
Brett L. Thurman
C. Marshall Esler, Jr.
Janice M. Paulus
Douglas C. Taylor
James M. Hill
Thomas M. Hanna
Randolph J. Bernard
Susan N. Elliott
Mary P. Egan
Gregory T. Engler
Kathleen M. Whalen
Elizabeth J. Hurley
Mattison C. Painter
Peter A. Igel
Mary J. Kosterlitz*

*Admitted in Virginia only
J. Bradford Coolidge
1888-1965

Retired
Hugh E. Wall, Jr.

COOLIDGE
WALL
WOMSLEY &
LOMBARD

A Legal Professional
Association

600 IBM Building
33 West First Street
Dayton, Ohio 45402
513-223-8177
Telecopier: 513-223-6705
Cable: COOL-LAW

November 2, 1990

VIA FEDERAL EXPRESS

7398225796

Sally K. Swanson, Chief
IN-MN-OH Enforcement Program Section
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

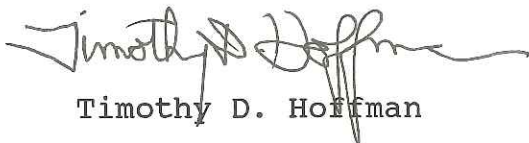
RE: ERISA Violation
R. L. Drake Company
OHT 400 010 419

Dear Ms. Swanson:

Our firm represents R. L. Drake Company in connection with the above matter and this letter is sent to request a ten-day extension of time within which to answer. If this extension presents a problem please contact me immediately at (513) 223-8177.

Thank you for your cooperation in this regard.

Very truly yours,


Timothy D. Hoffman

TDH:pp
25595-00-401

cc: Mr. Steve Morgan
Mr. Peter Pluto

RECEIVED
NOV 05 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Robert B. Womsley
John C. Lombard
Ronald S. Pretckin
Roger J. Makley
Jacob A. Myers
Jonas J. Gruenberg
Fry A. Melnick
rle F. Wilberding
Hugh E. Wall, III
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Association

600 IBM Building
33 West First Street
Dayton, Ohio 45402
513-223-8177
Telecopier: 513-223-6705
Cable: COOL-LAW

November 14, 1990

VIA FEDERAL EXPRESS

7398225645

Sally K. Swanson, Chief
IN-MN-OH Enforcement Program Section
United States Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

RE: Notice of Violation
R. L. Drake Company
OHT 400 010 419

Dear Ms. Swanson:

After carefully reviewing your October 5, 1990 correspondence with R. L. Drake and its representatives, we do not believe there has been any violation of the Land Disposal Regulations. Your letter referred to the July 14, 1989 Ohio Environmental Protection Agency (OEPA) inspection. Although your letter was not specific in delineating the alleged Land Disposal Regulation violations, it appears that your allegations involve the determination of whether the R. L. Drake waste was restricted. Your letter also indicated the methods for determining whether wastes exceed applicable treatment standards. Following up on your letter, R. L. Drake representatives spoke with Gordon Garcia and we believe your concern centered around 40 CFR §268.7 (a)(1) and (5).

The OEPA Inspection Report indicated that R. L. Drake had not determined whether their F-solvent waste exceeded treatment standards. That conclusion was incorrect on the part of OEPA. In addition, the OEPA was incorrect in its statement that F-solvent waste had not been shipped off site since 12/30/83. In any event, R. L. Drake knew that its F-solvent wastes were restricted. R. L. Drake complied with 40 CFR §268.7 (a)(1) by delivering a Notice of Land Disposal Restriction of Waste to its disposal contractor prior to the shipment of that waste. A copy of that Notice is enclosed. With respect to 40 CFR §268.7 (a)(5) R. L. Drake relied upon material safety data sheets pertinent to the F-solvent waste in making its determination that that material was restricted. Copies of those material safety data sheets are enclosed.

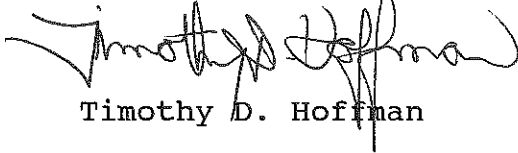
COOLIDGE
WALL
WOMSLEY &
LOMBARD

A Legal Professional
Association

Sally K. Swanson, Chief
November 14, 1990
Page Two

Therefore, we request that your Notice concerning possible Land Disposal Regulation violations be rescinded. If you have any questions or wish to discuss this further, please contact me directly.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Timothy D. Hoffman". The signature is fluid and cursive, with a large, stylized initial "T".

Timothy D. Hoffman

TDH:pp
Enclosure
25595-00-401

cc: Mr. Steve Morgan w/o enclosure
Mr. Peter Pluto w/o enclosure

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP
STATE HWY 148
NEWCASTLE KY 40050

EPA ID No.: KYD053348108

Under manifest number 91843 line number 11A (enter 11a, 11b, 11c, or 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste type and the appropriate treatment standards (from Table CCWE of 40 CFR 268.41) are as follows:

EPA Waste Type: F002 (Enter F001, F002, F003, F004 or F005)

F001-F005 Solvents	TREATMENT STANDARDS (mg/l)		Check All That Apply
	Wastewater w/Solvents	All Other Solvent Waste	
Acetone	0.05	0.59	<u>X</u>
n-Butyl alcohol	5.0	5.0	<u> </u>
Carbon disulfide	1.05	4.81	<u> </u>
Carbon tetrachloride	.05	.96	<u> </u>
Chlorobenzene	.15	.05	<u> </u>
Cresols (and cresylic acid)	2.82	.75	<u> </u>
Cyclohexanone	.125	.75	<u> </u>
1,2-dichlorobenzene	.68	.125	<u> </u>
Ethyl acetate	.05	.75	<u> </u>
Ethyl benzene	.05	.053	<u> </u>
Ethyl ether	.05	.75	<u> </u>
Isobutanol	5.0	5.0	<u> </u>
Methanol	.25	.75	<u> </u>
Methylene chloride	.20	.96	<u> </u>
Methylene chloride (from pharmaceutical industry)	12.7	.96	<u> </u>
Methyl ethyl ketone	0.05	0.75	<u> </u>
Methyl isobutyl ketone	0.05	0.33	<u>X</u>
Nitrobenzene	0.66	0.125	<u> </u>
Pyridine	1.12	0.33	<u> </u>
Tetrachloroethylene	0.079	0.05	<u> </u>
Toluene	1.12	0.33	<u>X</u>
1,1,1-Trichloroethane	1.05	0.41	<u> </u>
1,1,2-Trichloro - 1,2,2 trifluoroethane	1.05	0.96	<u> </u>
Trichloroethylene	0.062	0.091	<u>X</u>
Trichlorofluoromethane	0.05	0.96	<u> </u>
Xylene	0.05	0.15	<u> </u>

Generator Name: RL DRAKE EPA ID: OH0400010418

Generator Representative Signature: William B. Mangano

Name & Title of Representative: William B. Mangano P.E. mgr.
(print or type)

S-K Sample Number: 035801 CONTROL # 043847

7-4
31112



MATERIAL SAFETY DATA SHEET

APPROVED BY U S DEPT OF LABOR, ESSENTIALLY SIMILAR TO FORM OSHA20
 OLD WORLD TRADING CO
 ACRANDI'DIV
 NORTH AMERICAN ENTERPRISES DIV
 ONE NORTH BROADWAY
 DES PLAINES, IL 60016
 EMERGENCY PHONE: 1-312-699-2000

CHEMICAL NAME & SYNONYMS: Solvent
 CHEMICAL FAMILY: Chlorinated Solvent
 FORMULA: C12C:CHCl
 TRADE NAME: Trichlorethylene

I. PHYSICAL DATA

BOILING RANGE : 84 86 87°C / 184 186 188°F
 API GRAVITY : Not Applicable
 SPECIFIC GRAVITY (Water=1) : 1.460
 POUNDS/GALLON : 12.162
 VAPOR PRESSURE (mm of Hg)@20°C : 52.4
 VAPOR DENSITY (air=1) : 4.9
 SOLUBILITY IN WATER : Negligible
 SOLUBILITY IN ACID (85% H2SO4) : Moderate
 DRY TIME (Ether=1) : 2.5
 % VOLATILE BY VOL : 100.0
 APPEARANCE : Clear, Water-White
 ODOR : Chlorinated
 HKB (Hydrogen Bonding) : 18.0
 PKB (Polarity) : 40.0
 DKB (Dispersion) : 42.0
 REFRACTIVE INDEX : 1.478

II. HAZARDOUS INGREDIENTS

TERIAL	CAS-#	VOL(%)	TLV(ppm)
Trichlorethylene	79-01-6	100	50
LOWEST KNOWN LD50 (ORAL)	79-01-6	4920 mg/kg(Rats)	
LOWEST KNOWN LC50 (VAPORS)	79-01-6	7800 ppm (Mice)	
DOT SHIPPING NAME: Trichlorethylene (UN1710)			

HAZARD RATING
 HEALTH: 2 FLAMMABILITY: 1 REACTIVITY: 0

III. FIRE & EXPLOSION HAZARD DATA

LOWER FLAMMABLE LIMIT IN AIR (% by vol): Not Applicable
 FLASH POINT (TEST METHOD): Not Applicable
 FLAMMABILITY CLASSIFICATION: Non-Combustible

EXTINGUISHING MEDIA : NFPA Class B extinguishers (CO2 or foam)
 for class liquid fires.

SPECIAL FIRE FIGHTING PROCEDURES : Water spray may be ineffective on fire but
 can protect fire fighters & cool closed
 containers. Use fog nozzles if water is
 used. Use air-supplied breathing masks.

UNUSUAL EXPLOSION AND FIRE PROCEDURES : ! Keep container tightly closed.
 Isolate from oxidizers, heat, & open flame.
 Closed containers may explode if exposed
 to extreme heat. Applying to hot surfaces
 requires special precautions.

Legal responsibility is assumed only for the fact that all studies reported here & all opinions are those of
 qualified experts. Buyer assumes all risk & liability. He accepts & uses this material on these conditions.

IV. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 50 ppm

EFFECTS OF ACUTE OVER-EXPOSURE:

- INHALING: Anesthetic. Irritates respiratory tract.
- May cause serious nervous system depression.
- May cause damage to kidneys, blood, nerves, liver & lungs.
- Absorption thru skin increases exposure.

SKIN CONTACT: Primary irritation, defatting, dermatitis.

EYE CONTACT: Primary irritation, redness, tearing, blurred vision.

VAPOR: Harmful. Swallowing can cause abdominal irritation, nausea, vomiting and diarrhea.

EFFECTS OF SWALLOWING AND CHRONIC OVER-EXPOSURE:

EMERGENCY & FIRST AID PROCEDURES:

- In case of contact with skin, flush with plenty of water. For eyes, flush with plenty of water for 15 minutes & get medical attention.
- After high vapor exposure, remove to fresh air. If breathing is difficult give oxygen. If breathing has stopped give artificial respiration.
- If swallowed, CALL A PHYSICIAN IMMEDIATELY! Do NOT induce vomiting.
- Have patient lie down & keep warm. Vomiting may lead to aspiration into lungs causing pneumonitis which may be fatal.
- PHYSICIAN: Give oxygen until recovery. Do not give patient sympathomimetic amines such as epinephrine, which may cause arrhythmias.

V. REACTIVITY DATA

STABILITY: Stable

CONDITIONS TO AVOID: Isolate from heat, & open flame.

MATERIALS TO AVOID: Isolate from strong oxidizers such as permanganate.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon Monoxide & Hydrogen Chloride with traces of phosgene from burning.

VI. ENVIRONMENTAL PROTECTION

ALL OR LEAK PROCEDURES:

- Small: Mop up with absorbent material & transfer to hood.
- Large: Isolate from oxidizers, heat, & open flame.
- Persons without proper protection should be kept from area until cleaned up.
- Stop spill at source. Dike area to prevent spread. Pump liquid to salvage tank.
- Remainder may be taken up on absorbent material & shoveled into containers.

WASTE DISPOSAL METHOD:

- Small: Evaporate until all vapors are gone.
- Dispose of remainder by legally applicable methods.
- Large: Recycle or dispose of observing local, state & Federal health, safety & pollution laws.

VII. EMPLOYEE PROTECTION

RESPIRATORY PROTECTION: Ventilate to keep air below 25 ppm. If over TLV, use self-contained air pack approved by NIOSH/MSHA. Consult Safety Equipment Supplier.

(SPECIFY TYPE): Use explosion-proof equipment.

VENTILATION:

- LOCAL EXHAUST: Preferable
- MECHANICAL (GENERAL): Acceptable
- SPECIAL: None
- OTHER: None

PROTECTIVE CLOTHING: Recommended (Must be impervious to solvents)

EYE GOGGLES: OSHA Standard chemical splash goggles are advised. Consult Safety Equipment Supplier.

OTHER PROTECTIVE EQUIPMENT: To prevent contact with skin, wear impervious clothing & boots.

VIII. SPECIAL PROTECTIONS

Do not store above 49°C/120°F. Store large amounts in structures made for OSHA Class liquids. Avoid falling liquid. Ground containers when pouring. Do not flame cut, break or weld. Empty container hazardous! Continue all label precautions!

Do not drink alcohol shortly before, during or after use.

DATE: 5 / 85

Trichloroethylene
CONTAINS: CHLORINATED SOLVENT

WARNING!

VAPOR HARMFUL
SWALLOWING CAN CAUSE ABDOMINAL IRRITATION,
NAUSEA, VOMITING AND DIARRHEA

Use only with adequate ventilation.

Avoid breathing of vapor or spray mist.

Avoid contact with skin & eyes. Do not take internally.

Drinking alcohol shortly before, during or after use may cause unwanted effects. Contact with hot surfaces may produce toxic gases.

Keep closure tight & upright to prevent leakage. Keep closed when not in use.

Ground containers when pouring. Do not flame cut, braze or weld.

DISPOSAL: Recycle or dispose of observing local, state & Federal health, safety & pollution laws. If spilled, Mop up & dispose of.

FIRST AID: In case of contact with skin, flush with plenty of water. For eyes, flush with plenty of water for 15 minutes & get medical attention.

After high vapor exposure, remove to fresh air. If breathing is difficult

give oxygen. If breathing has stopped give artificial respiration.

If swallowed, **CALL A PHYSICIAN IMMEDIATELY!** Do NOT induce vomiting.

Have patient lie down & keep warm. Vomiting may lead

to aspiration into lungs causing pneumonitis which may be fatal.

PHYSICIAN: Give oxygen until recovery. Do not give patient sympathomimetic amines such as epinephrine, which may cause arrhythmias.

Consult MSDS for further information.

FOR INDUSTRY USE ONLY

KEEP OUT OF THE REACH OF CHILDREN

OLD WORLD TRADING CO

ONE NORTH BROADWAY

DES PLAINES, IL 60016

T SHIPPING NAME: Trichloroethylene (UN1710)

Legal responsibility is assumed only for the fact that
all studies reported here & all opinions are those of
qualified experts. Buyer assumes all risk & liability.
He accepts & uses this material on these conditions.

ATTENTION!!

THIS CONTAINER HAZARDOUS WHEN EMPTIED
SINCE EMPTIED CONTAINERS RETAIN PRODUCT
RESIDUES (VAPOR OR LIQUID), ALL HAZARD
PRECAUTIONS MUST BE OBSERVED.

HAZARD RATING
HEALTH: 2 FLAMMABILITY: 1 REACTIVITY: 0



Gem City Chemicals, Inc.

1287 AIR CITY AVE

DAYTON, OHIO 45404

TELEPHONE 513 224-0711

8-4

30602

(Approved by U.S. Department of Labor "Essentially Similar" to Form LSB-005-4)

Information on this form is furnished solely for the purpose of compliance with the Occupational Safety and Health Act of 1970 and shall not be used for any other purpose. Use or dissemination of all or any part of this information for any other purpose or purposes is illegal.

PRODUCT ACETONE

SECTION I - PRODUCT

MANUFACTURER'S NAME

Exxon Chemical Company U.S.A.

ADDRESS (NUMBER, STREET, CITY, STATE AND ZIP CODE)

P.O. Box 3272 Houston, Texas 77001

CHEMICAL NAME AND SYNONYMS

2-Propanone

CHEMICAL FAMILY

Ketone

FORMULA

CH₃COCH₃

TRADE NAME AND SYNONYMS

Acetone

EMERGENCY TELEPHONE NO.
713/ 870-6000

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	%	TLV (UNITS)	INGREDIENT	%	TLV (UNITS)

Hazardous Mixtures of Other Liquids, Solids or Gases

Not Applicable to Pure Chemicals

SECTION III - PHYSICAL DATA

BOILING POINT (°F)	<u>56°C (133°F)</u>	SPECIFIC GRAVITY (H ₂ O = 1)	<u>@ 20/20°C - 0.792</u>
VAPOR PRESSURE (MM HG.)	<u>@ 38°C - 380</u>	PERCENT VOLATILE BY VOLUME (%)	<u>100%</u>
VAPOR DENSITY (AIR = 1)	<u>2.0</u>	EVAPORATION RATE (BuAc = 1)	<u>11.6</u>
SOLUBILITY IN WATER	<u>Complete</u>		
APPEARANCE AND ODOR	<u>Clear, colorless liquid - sweet, pungent odor</u>		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD)	<u>T.C.C. - 18°C (0°F)</u>	FLAMMABLE LIMIT	<u>@ 25°C (77°F)</u>	LEL	<u>2.6</u>	UEL	<u>13.0</u>
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EXTINGUISHING MEDIA

Dry chemical or alcohol-type foam. Waterspray may be ineffective.

SPECIAL FIRE FIGHTING PROCEDURES

Use waterspray to cool fire-exposed surfaces and to protect personnel.

ADDITIONAL FIRE AND EXPLOSION HAZARDS

Respiratory protection required for fire fighting personnel. Stay upwind, if possible. Cool exposed tanks with water. No unusual products of combustion.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE 1000 ppm

ROUTE: Vapor irritates eyes, nose & throat. Liquid may cause eye injury.

CHRONIC: Liquid is irritating to skin, causing dermatitis.

INHALATION: Remove to fresh air. If breathing stopped, give artificial respiration. Keep patient calm; call physician. SKIN: Flush with water until irritation subsides. EYES: Flush with water for at least 15 min; call physician.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE	CONDITIONS TO AVOID
		Not applicable
	STABLE	X

INCOMPATIBILITY MATERIALS TO AVOID

Inorganic acids, caustic, amines, alkanolamines, oxygen, halogens, aldehydes,

HAZARDOUS DECOMPOSITION PRODUCTS ammonia, oxidizing agents, chlorinated compounds.

None

HAZARDOUS POLYMERIZATION	MAY OCCUR	CONDITIONS TO AVOID
	WILL NOT OCCUR	X

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Keep public away. Shut off source if possible to do so without hazard. Eliminate sources of ignition. Warn occupants of downwind areas of explosion hazard. Prevent liquid from entering sewers, watercourses or low areas.

WASTE DISPOSAL METHOD

Contain spilled liquid with sand or earth. Dilute contained spill with water.

Cover free liquid by pumping or with a suitable absorbant. Consult a disposal expert and ensure conformity to local regulation.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE)

Use approved respiratory protection such as air-supplied mask for enclosed area

PROTECTIVE GLOVES

Chemically resistant gloves

EYE PROTECTION

Chemical splash goggles or face shield

VENTILATION

LOCAL EXHAUST

Face velocity > 60 fpm in confined space

SPECIAL

MECHANICAL (GENERAL)

Explosion-proof ventilation equipment

OTHER

No smoking or open lights

OTHER PROTECTIVE EQUIPMENT

Usually not needed

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Keep container closed when not in use. Do not handle or store near flame, heat, or strong oxidants. Adequate ventilation required.

OTHER PRECAUTIONS

All handling equipment should be electrically grounded.

Date Issued

By:

TO:

Gem City Chemicals, Inc.

1287 AIR CITY AVE.
DAYTON, OHIO 45404

Name

Title

Signature:

OCT 5 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William B. Maugans
R.L. Drake Company
230 Industrial Drive
Franklin, Ohio 45005

Re: Notice of Violation
R.L. Drake Company
OHT 400 010 419

Dear Mr. Maugans:

On July 14, 1989, the Ohio Environmental Protection Agency (OEPA), representing the United States Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above referenced facility. The purpose of the inspection was to determine the compliance status of this facility with respect to the applicable hazardous waste management requirements of Chapter 3734 of the Ohio Revised Code, and also the land disposal restriction regulations as set forth in 40 CFR Part 268 and in revisions to 40 CFR Parts 260-265, 268, 270, and 271.

As a result of the inspection, we have determined that the requirements of the land disposal restriction regulations are being violated.

The facility did not determine if the wastes exceed applicable treatment standards. The concentrations may be determined by testing the waste using the Toxicity Characteristic Leaching Procedure Test (Appendix 1 to Part 268), or by determining if the wastes exceed the treatment standards using knowledge of the wastes. If the latter method is used, all supporting data used to make the determination must be maintained in your files.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further enforcement action.

-2-

If you have any questions regarding this correspondence, please contact Gordon Garcia of my staff at (312) 886-8097.

Sincerely yours,

Sally K. Swanson, Chief
IN/MN/OH Enforcement Program Section

Enclosure

cc: Mike Savage, OEPA
Frank Bryant, SWDO

bcc: Sally Swanson, REB

5HR-12 garcia.walker 6-8093 diskette #5 filename: wil.b

Dr
9-28-90

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	9/28/90	9/28/90	



State of Ohio Environmental Protection Agency

Southwest District Office

3 South Main Street
Dayton, Ohio 45402-2086
(513) 449-6357
FAX (513) 449-6249

5/11/89
LBH
15
Richard F. Celeste
Governor

July 25, 1989

Re: R.L. DRAKE COMPANY
HAZARDOUS WASTE
WARREN COUNTY
OHT400010419
GENERATOR

Mr. William B. Maugans
R.L. Drake Company
230 Industrial Drive
Franklin, Ohio 45005

Dear Mr. Maugans:

On July 14, 1989, Mr. Chris Kotsko (OEPA) and I met with you to conduct a RCRA inspection to determine the compliance status of the R.L. Drake Company with State Hazardous Waste Rules and Regulations. Also, we conducted A RCRA Land Disposal Restriction inspection for F-solvents (F001-F005), California list waste and First and Second Third wastes. The Land Disposal Restriction Regulations are presently being handled by U.S. EPA Region V, and therefore the checklist for the LDR-wastes will be forwarded to them for appropriate follow-up. Copies of all the completed inspection checklists are attached for your review.

During the inspections and subsequent paperwork review, the following deficiencies/violations were discovered. Violations are prefaced by (OAC) Ohio Administrative Code and Ohio Revised Code (ORC).

1. ACCUMULATION TIME OF WASTE. OAC 3745-52-34 (A) (2).

These regulations require that the date that accumulation of hazardous waste begins is clearly marked on containers and is visible for inspection.

The R.L. Drake Company did not mark the accumulation date on any container of hazardous waste onsite.

2. ACCUMULATION TIME OF HAZARDOUS WASTE OAC 3745-52-34 (A) (3).

These regulations require that while being accumulated on site each container is labeled or marked with words "Hazardous Waste".

The R.L. Drake Company did not label the following wastes in compliance with the above regulation.

- a. Four (4) drums of waste solvent in storage area.
- b. Seven (7) drums of waste caustic soda near pretreatment area.
- c. Six (6) drums of filter cake (F006) near pretreatment.

3. MAINTENANCE AND OPERATION OF FACILITY OAC 3745-65-31.

These regulations require that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned release of Hazardous Waste which could threaten human health or the environment.

The R.L. Drake Company did not store hazardous waste in a manner consistent with the above regulation. Hazardous wastes were stored in several areas around the facility in disarray because the waste has not been shipped off site regularly.

4. REQUIRED AISLE SPACE OAC 3745-65-35.

These regulations require that the facility must maintain aisle space in the hazardous waste storage area to allow for the unobstructed movement of personnel and emergency equipment.

The R.L. Drake Company did not maintain adequate aisle space in any area storing hazardous waste.

5. MANAGEMENT OF CONTAINERS OAC 3745-66-73 (A).

These regulations require that a container holding hazardous waste must always be closed during storage, except when adding or removing waste.

The containers in which the filter cake accumulated and the seven drums of caustic soda were open.

6. MANAGEMENT OF CONTAINERS OAC 3745-66-73 (B).

These regulations require that "A container holding Hazardous Waste must not be opened, handled or stored in a manner which may rupture the container or cause it to leak".

The Hazardous Waste storage areas of the R.L. Drake Company were not adequate to assure compliance with this regulation due to the other materials stored with the hazardous waste.

Hazardous wastes were stored near processes which could have subjected the containers to accidental damage.

7. INSPECTIONS. OAC 3745-66-74.

These regulations require that the facility must inspect areas where containers of hazardous wastes are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors".

The R.L. Drake Company did not inspect the hazardous waste storage area on at least a weekly basis. No records were present that indicated weekly inspection of the drum storage area have occurred. I have enclosed a copy of an example inspection log for your use. A weekly inspection log should be completed during each weekly inspection.

8. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES. OAC 3745-66-77 (C).

These regulations require that a storage container holding a Hazardous waste that is incompatible with any waste or other materials stored nearby must be separated from the other materials or protected from them by means of a berm, wall or other device.

The hazardous waste storage areas at the R.L. Drake Company were not separated from other materials stored nearby which may have been incompatible with the waste.

9. ANNUAL REPORTS. OAC 3745-52-41.

These regulations require that a company that generates hazardous wastes and sends them off-site shall prepare and submit annual reports to the Ohio EPA.

The R.L. Drake Company has not submitted annual reports.

10. ACCUMULATION TIME. OAC 3745-52-34 (C) (1).

These regulations require that satellite accumulation containers be marked indicating the contents of the container and be closed.

The R.L. Drake Company stored F006 filter cake and caustic soda near the waste water pretreatment plant in a manner inconsistent with this regulation.

11 ACCUMULATION TIME. OAC 3745-52-34 (C) (2).

These regulations require that amounts of hazardous waste in excess of 55 gallons stored near the point of generation must be labeled with the date the excess accumulation began.

The R.L. Drake Company did not date the excess F006 filter cake or the drums of canstic soda with the appropriate dates.

12, CONDITION OF CONTAINERS. OAC 3745-66-71.

Condtaiers holding hazardous waste must be in good condition.

The containers holding canstic soda had the tops cut out. This waste should be placed in closed containers.

13. ILLEGAL TREATMENT AND STORAGE OF HAZARDOUS WASTE. ORC 3734.02 (F).

The R.L. Drake Company was performing treatment on the filter cake from the pretreatment plant (F006) by drying the material in the open hopper after generation. The filter cake must be placed in closed containers immediately after generation.

The R.L. Drake Company is operating as a hazardous waste storage facility. Regulations allow a generator to accumulate hazardous waste for 90 days without obtaining a permit for storage. The R.L. Drake Company has accumulated the following hazardous wastes for greater than 90 days.

- a. Spent trichloroethylene (F001) has been stored on site since 1983.
- b. Filter cake from the pretreatment process (F006) has been stored on site since February 23, 1988.

During our investigation of July 14, 1989, samples were collected from three (3) drums of material located in your companies outside storage area; sample results are forthcoming. Do not remove any material from this storage area without contacting this office in advance

Copies of your Companies training and contingency plans have been received in this office. These plans will be reviewed to determine compliance with applicable regulations.

Mr. Maugans
July 25, 1989
Page 5

The R.L. Drake Company must correct items 1-13 and submit documentaion of actions taken to this office within thirty (30) days of receipt of this letter.

If you should have any questions, please feel free to call me at 449-6357.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Bryant".

Frank Bryant
Division of Solid and Hazardous
Waste Management Unit

FB/cjf

cc: Dave Sholtis, DSHWM, CO
Chris Kotsko, DSHWM, SWDO
Steve Morgan, R.L. Drake



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
514) 644-3020
FAX (614) 644-2329

RECEIVED

JUL 26 1993

George V. Voinovich
Governor

OFFICE OF RCRA Donald R. Schregardus
WASTE MANAGEMENT DIV. Director
EPA, REGION 1

July 20, 1993

Re: R. L. Drake Company
U.S. EPA ID No.
OHT400010419
Completion of Closure

R. L. Drake Co.
230 Industrial Dr.
Franklin, Ohio

Dear Sir or Madam:

According to Ohio EPA records, on October 14, 1992, the Director of the Ohio EPA approved a closure plan submitted by the R. L. Drake Company for a hazardous waste container storage pad located at 230 Industrial Dr., Franklin, Ohio. On June 11, 1993, the Ohio EPA, Southwest District Office, received a copy of the closure certification and documentation concerning this site. Ohio EPA District Office personnel completed a certification of closure inspection and a review of documents pertaining to the storage pad on July 8, 1993.

Based on this inspection and review, the Ohio EPA has determined that the hazardous waste container storage pad has been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and R. L. Drake will continue to be a large quantity generator (LQG) of hazardous waste.

As specified in OAC Rule 3745-66-40, R. L. Drake Company will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this facility, in accordance with OAC Rules 3745-66-43(H) and 3745-66-47(E).

R. L. Drake and Company should continue to use the U.S. EPA identification number assigned to the Company for purposes of Ohio EPA manifest, recordkeeping, and reporting requirements as appropriate.

Please note that this letter does not relieve the R. L. Drake & Company of any corrective action responsibilities that may be required.



Printed on recycled paper

Sincerely yours,

cc. Harriet Croke, U.S. EPA, Region 5 ✓
Randy Meyer, DHWM
Laurie Stevenson, DHWM
Beth Barrett, DHWM
Phil Harris, SWDO



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED
WMD RCRA MAR 30 1993
RECORD CENTER *Per A*
not

George V. Voinovich
Governor

Donald R. Schregardus
Director

October 14, 1992

CERTIFIED MAIL

CLOSURE PLAN APPROVAL

Mr. Steve Morgan,
Vice President, Manufacturing,
R. L. Drake Company
230 Industrial Drive
Franklin, Ohio 45005

RE: CLOSURE PLAN
RL DRAKE COMPANY
OHT 400 010 419

Dear Mr. Morgan:

On November 25, 1991, R. L. Drake Company (RLD) submitted to Ohio EPA a closure plan for the hazardous waste container storage pad located at 230 Industrial Drive, Franklin, Ohio. Revisions to the closure plan were received on August 31, 1992. The closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the storage area proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan of RLD in accordance with OAC Rule 3745-66-12 (and OAC 3745-66-18). No comments were received by Ohio EPA in this matter.

Based upon review of RLD's submittal and subsequent revisions, I conclude that the closure plan meets the performance standard contained in OAC 3745-66-11 and complies with the pertinent parts of OAC Rule 3745-66-12.

The closure plan submitted to Ohio EPA on November 25, 1991 and revised August 31, 1992 by RLD, is hereby approved.

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

By: Mary Gavin Date OCT 14 1992

OHIO E.P.A.

OCT 14 92

ENTERED DIRECTOR'S JOURNAL

Mr. Steve Morgan

Page 2

Please be advised that approval of this closure plan does not release RLD from any responsibilities as required under the Hazardous and Solid Waste Amendments of 1984 regarding corrective actions for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit.

Notwithstanding compliance with the terms of the closure plan, the Director may, on the basis of any information that there is or has been a release of hazardous waste, hazardous constituents, or hazardous substances into the environment, issue an order pursuant to Section 3734.20 et seq of the Revised Code or Chapters 3734 or 6111 of the Revised Code requiring corrective action or such other response as deemed necessary; or initiate appropriate action; or seek any appropriate legal or equitable remedies to abate pollution or contamination or to protect public health or the environment.

Nothing here shall waive the right of the Director to take action beyond the terms of the closure plan pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. § 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA") or to take any other action pursuant to applicable Federal or State law, including but not limited to the right to issue a permit with terms and conditions requiring corrective action pursuant to Chapters 3734 or 6111 of the Revised Code; the right to seek injunctive relief, monetary penalties and punitive damages; to undertake any removal, remedial, and/or response action relating to the facility; and to seek recovery for any costs incurred by the Director in undertaking such actions.

You are notified that this action of the Director is final and may be appealed to the Environmental Board of Review pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Board of Review within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency and the Environmental Enforcement Section of the Office of the Attorney General within three (3) days of filing with the Board. An appeal may be filed with the Environmental Board of Review at the following address: Environmental Board of Review, 236 East Town Street, Room 300, Columbus, Ohio 43266-0557.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin

OCT 14 1992 Date

ENTERED DIRECTOR'S JOURNAL

OHIO E.P.A.

OCT 14 92

Mr. Steve Morgan

Page 3

When closure is completed, the Ohio Administrative Code Rule 3745-66-15 requires the owner or operator of a facility to submit to the Director of the Ohio EPA certification by the owner or operator and an independent, registered professional engineer that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall be submitted to: Ohio Environmental Protection Agency, Division of Hazardous Waste Management, Attn: Thomas Crepeau, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149.

Sincerely,


Donald R. Schregardus
Director

cc: Tom Crepeau, DHWM, CO, OEPA
Section Chief, Ohio Permit Section, USEPA, Region V
Harold O'Connell, SWDO, OEPA
Montee Suleiman, CO, OEPA

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By: Mary Cavin Date OCT 14 1992

OHIO E.P.A.

OCT 14 92

ENTERED DIRECTOR'S JOURNAL

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: R.L. DRAKE

U.S. EPA I.D. No.: OH T400010419

Street: 230 INDUSTRIAL DRIVE

City: FRANKLIN State: OH Zip Code: 45005

Telephone: (513) 866-2421

Operator: SAME

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: SAME

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 7/14/89 Time: 0900-1400 Weather Conditions: CLEAR WINDY

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>FRANK BRYANT</u>	<u>OEPA</u>	<u>(513) 449-6357</u>
	<u>CHRIS KOTSKO</u>	<u>OEPA</u>	<u>(513) 449-6357</u>

Facility Representatives: BILL MAUGANS (513) 866-2421

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>	<u>First Third</u>
Generator	<u>✓</u>	<u>✓</u>	<u>✓</u>	<u>✓</u>
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	_____	_____	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. F002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. F003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. F004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. F005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cadmium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chromium VI	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lead	500 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mercury	20 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nickel	134 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Selenium	100 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Thallium	130 mg/L	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

✓ _____	_____	_____	_____	_____
------------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
---------------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing: _____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	✓				
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
K020*					
K021*					
K022*					
K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

					APP
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing
☒ spent methylene chloride
☐ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☒ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☒ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
☒ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
<u>F006</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

B. Waste Analysis

1. F-Solvent Wastes

HAS NOT SENT SOLVENTS OFF SITE SINCE 12-30-83

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☐ Yes ☒ No ☐ NA

How was this determination made?

- Knowledge of waste

☐ Yes ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☐ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results. _____

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: SOLVENT DEGREASER

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

DOES NOT TEST WASTE

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☒ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☒ No ☐ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added:

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☒ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes ☒ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes ☒ No _____ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

☒ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

☒ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: TREATMENT SLUDGE FROM PRETREATMENT (FOOG)

How was this determination made?

- Knowledge of waste

_____ Yes ☒ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

☒ Yes ☐ No ☐ NA

- Total Constituent Analysis

☐ Yes ☐ No ☐ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☐ Yes ☒ No

the generator has not shipped F006 since 12/3/80 or F001 since 1/83

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☐ Yes ☐ No *NA*

- c. Does notification contain the following? *no notification sent*

EPA Hazardous waste number(s) ☐ Yes ☐ No

Applicable treatment standards ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Identify off-site treatment or storage facilities: _____

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? *NA*

☐ Yes ☐ No

- f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No

Applicable treatment standards ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information? *NA*

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *NA*

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted? ☐ Yes ☐ No

Addresses ☐ Yes ☐ No

Telephone Numbers ☐ Yes ☐ No

Contact dates ☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

(iii) Waste analysis data,
if available ____ Yes ____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ ☒ Yes ____ No

If yes, list types of waste treatment units and processes:

FOOD SLUDGE

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

NA

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

FEB 24 1989

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: R.L. DRAKE CO Date of Inspection: 2-14-89
 Address: 230 INDUSTRIAL DRIVE HWFB #: _____
FRANKLIN OH. 45005 USEPA ID #: QHT 400010419
 County: WARREN Facility Phone #: 746-4556
 Facility Contact: BILL MAUGANS Facility Contact Phone #: 746-4556
 Safety Equipment #: _____
 Inspector(s) Name(s): FRANK BRYANT
CHRIS KOTSKO

STATUS

Cond. Ex. SQG _____ SQG _____ Generator X Transporter _____ Treatment _____ Storage _____ Disposal _____

ACTIVITIES

Containers X Tanks _____ Surface Impoundments _____ Incineration/Thermal treatment _____
 Waste pile _____ Land treatment _____ Landfill _____ Groundwater monitoring _____
 Used oil burner _____ Hazardous waste fuel burner/blender _____

- | | Y/N/NA | REMARK # |
|---|-----------|--------------|
| 1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>NA</u> | <u>_____</u> |
| 2. Are they : | | |
| a. Abandoned (disposed; incinerated; accumulated, stored, or treated prior to disposal)? | <u>NA</u> | <u>_____</u> |
| b. Recycled? | <u>NA</u> | <u>_____</u> |
| c. Inherently waste-like? (F020, F021, F022, F023, F026, F028)? | <u>NA</u> | <u>_____</u> |
| 3. If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. Used in a manner constituting disposal? | <u>NA</u> | <u>_____</u> |
| b. Burned for energy recovery? | <u>NA</u> | <u>_____</u> |
| c. Reclaimed? (Refer to Table 1 of 3745-51-02) | <u>NA</u> | <u>_____</u> |
| d. Accumulated speculatively? | <u>NA</u> | <u>_____</u> |
| 4. Is the material recycled by being: | | |
| a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>NA</u> | <u>_____</u> |
| b. Used as an effective substitute for commercial products? | <u>NA</u> | <u>_____</u> |
| c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | <u>NA</u> | <u>_____</u> |

	<u>Y/N/NA</u>	<u>REMARK #</u>
5. Are LDR wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	<u> </u>
6. Has the facility submitted a Part A to Ohio?	<u>NA</u>	<u> </u>
7. If yes, is it complete and accurate?	<u>NA</u>	<u> </u>
8. If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	<u>NA</u>	<u> </u>
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>NA</u>	<u> </u>
10. Has the facility submitted a Part B?	<u>NA</u>	<u> </u>
11. Was advance notice of the inspection given? If so, how far in advance?	<u>N</u>	<u> </u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

- 1) F006 sludge from plating operation
- 2) caustic soda from anodizing of aluminum
- 3) spent etchant 0002 (alkaline)
- 4) CuSO_4 solution from electroless plating line 0002 (acidic)
- 5) spent trichloroethylene (F001)

Facility plates circuit boards and treats aluminum chassis for electronic satellite TV receivers.

Facility generates above wastes and stores them on site for greater than 90 days without a permit. The spent etchant is sent out monthly, however accompanied by a manifest.

Waste is stored inside the plant and in an outside storage area in 55 gal. drums.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG?
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?

<u>Y</u>	<u> </u>
<u>N</u>	<u> </u>
<u>Y</u>	<u>1</u>
<u>N</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>

- | | | Y/N/NA | REMARK # |
|----|---|--------|----------|
| 6. | Does the generator meet the following hazardous waste pre-transport requirements: | Y | |
| a. | Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)? | Y | |
| b. | Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)? | Y | |
| c. | Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)? | Y | |
| 7. | Does the generator import or export hazardous waste? | Y | |
| | If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)? | NA | |
| 8. | If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met: | | |
| a. | The containers or tanks are clearly marked with the words "Hazardous Waste"? | N | |
| b. | The date that accumulation began is clearly marked on each container? | N | |
| c. | If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist. | N | |

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist.
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time?
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77?
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days?
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?

NA

N 2 *hopper*

NA

N

3

N

Y

N

N

Y/N/NA REMARK #

12. Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34) 4
13. Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34) 4
14. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41? N
15. Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists. see checklist

REMARKS. GENERATOR REQUIREMENTS

- 1) pretreatment system for treating plating waste:
- 2) hopper receiving F006 filter cake contained more than 55 gallons.
- 3) hopper not marked and open drums of caustic soda not marked.
- 4) plan and records could not be produced during inspection

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>N</u>	_____
2. Has there been a fire, explosion or non-planned release of waste at the facility?	<u>N</u>	_____
3. If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
a. Internal alarm system?	<u>Y</u>	_____
b. Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	_____
c. Portable fire control equipment?	<u>Y</u>	_____
d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	_____
4. Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	_____
5. If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	_____
6. If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>N</u>	_____
7. If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	_____

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? _____ 1
 - b. Arrangements or agreements with local or state emergency authorities? _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))? _____
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) _____
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) _____
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) _____
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) _____ NA

1) Contingency plan will be reviewed when SWDO receives it from the facility

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	<u>N</u>	<u>1</u>
b. In good condition [3745-66-71] (265.171)?	<u>N</u>	<u></u>
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	<u>2</u>
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	<u>3+4</u>
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>N</u>	<u></u>
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>N</u>	<u></u>
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	<u></u>
6. Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>N</u>	<u></u>

- 1 caustic soda
- 2 " " in steel drum
- 3 " " drums not closed
- 4 hopper containing F006 filter cake not closed